

# **Exhibit 1**

E-Mails Between Counsel  
July 12, 2024



Cassidy Curran &lt;csc@randazza.com&gt;

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**Case No. 7:23-cv-04533 | Project Veritas et al v. O'Keefe et al | Reply in Support of Motion for Prelim. Injunction and Opposition to Renewed Cross Motion to Compel Arbitration**

4 messages

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**Jay M. Wolman** <jmw@randazza.com>

Fri, Jul 12, 2024 at 4:55 PM

To: chambersnysdseibel@nysd.uscourts.gov

Cc: Jeff Childers &lt;jchilders@smartbizlaw.com&gt;, "staff@randazza.com" &lt;staff@randazza.com&gt;,

"angela.masciulli@smartbizlaw.com" &lt;angela.masciulli@smartbizlaw.com&gt;, "rc@rcmaxwell.com" &lt;rc@rcmaxwell.com&gt;

Dear Judge Seibel,

Enclosed, please find a copy of Plaintiffs' Reply in Support of Motion for a Preliminary Injunction and Response in Opposition to Defendants' Renewed Cross-Motion to Compel Arbitration and Stay Proceeding (ECF No. 53).

Thank you for your attention to this matter.

Sincerely,  
Jay Wolman

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**Jay Marshall Wolman, CIPP/US, Counsel\*****Randazza Legal Group, PLLC**

100 Pearl Street, 14th Floor | Hartford, CT 06103

30 Western Avenue., Gloucester, MA 01930

353 Ocean Ave Ste. 4E, Brooklyn, NY 11226

Tel: 702-420-2001 | Email: [jmw@randazza.com](mailto:jmw@randazza.com)

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\* Licensed to practice law in Connecticut, Massachusetts, New York and the District of Columbia.

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**053 - Reply in Support of MPI and Opp to Cross Motion to Compel.pdf**

327K

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**Jay M. Wolman** <jmw@randazza.com>

Fri, Jul 12, 2024 at 4:59 PM

To: Jeff Childers &lt;jchilders@smartbizlaw.com&gt;

Cc: "staff@randazza.com" &lt;staff@randazza.com&gt;, "angela.masciulli@smartbizlaw.com"

&lt;angela.masciulli@smartbizlaw.com&gt;

Jeff,

As you know, there is a hearing on the 29th on our motion for preliminary injunction. Please advise if you are authorized to accept subpoenas for Mr. O'Keefe and OMG relative to that hearing or if we should have them directly served.

Thank you for your attention to this matter.

Sincerely,  
Jay Wolman

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**Jay Marshall Wolman, CIPP/US, Counsel\***

**Randazza Legal Group, PLLC**

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**Jeff Childers** <[jchilders@smartbizlaw.com](mailto:jchilders@smartbizlaw.com)>  
To: "Jay M. Wolman" <[jmw@randazza.com](mailto:jmw@randazza.com)>  
Cc: "staff@randazza.com" <[staff@randazza.com](mailto:staff@randazza.com)>, "angela.masciulli@smartbizlaw.com" <[angela.masciulli@smartbizlaw.com](mailto:angela.masciulli@smartbizlaw.com)>

Tue, Jul 16, 2024 at 10:10 AM

Jay,

Good morning. Sorry about the delay getting back to you — I was out at a busy conference all end of last week. To address your question, I do not presently have authority to waive service of process. If that changes, I will let you know.

Regards,

Jeff Childers

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**Jay M. Wolman** <[jmw@randazza.com](mailto:jmw@randazza.com)>  
To: Jeff Childers <[jchilders@smartbizlaw.com](mailto:jchilders@smartbizlaw.com)>  
Cc: "staff@randazza.com" <[staff@randazza.com](mailto:staff@randazza.com)>, "angela.masciulli@smartbizlaw.com" <[angela.masciulli@smartbizlaw.com](mailto:angela.masciulli@smartbizlaw.com)>

Tue, Jul 16, 2024 at 10:47 AM

Jeff,

To be clear, I was technically asking about accepting, not waiving, but I understand your position nevertheless.

Regards,  
Jay Wolman

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**Jay Marshall Wolman, CIPP/US, Counsel\***

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